



Wyoming Department of Agriculture

2219 Carey Ave., Cheyenne, WY 82002 ■ Phone: 307-777-7321 ■ Fax: 307-777-6593
E-mail: wda1.state.wy.us ■ Website: wyagric.state.wy.us

Dave Freudenthal, Governor

John Etchepare, Director

Board Members

District 1

Lee Otto

District 2

Meghan Lally

District 3

Reed Gardner

District 4

Helen Jones

District 5

Spencer Ellis

District 6

Alan Todd

District 7

Arlene Brown

November 8, 2004

Dan Olson
Dept. of Environmental Quality
Air Quality Division
122 W. 25th St., Herschler Building
Cheyenne, WY 82002

Dear Mr. Olson:

Wyoming Department of Agriculture staff members Grant Stumbough and Justin Williams attended the Wyoming Air Quality Advisory Board meeting on October 12, 2004. Below are comments from the Wyoming Department of Agriculture (WDA) on the proposed Wyoming Smoke Management Program (SMP) and the accompanying regulation, Wyoming Air Quality Standards and Regulations (WAGSR) Chapter 10, Section 4.

Our comments are specific to our mission within state government: to be dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources, and welfare of our citizens. We believe it's important we are kept informed of proposed actions and decisions, and continue to be provided the opportunity to express pertinent issues and concerns.

Fire is an important tool in the agriculture industry. It is used to enhance production and manage residue in crops, control noxious weeds and insects, decrease the spread of weed seeds, increase water volume in irrigation ditches, and more.

Agriculture burning is rather insignificant in Wyoming compared to other states, like Idaho where they have more row crop farming. Therefore, Wyoming's model probably does not need to be identical with Idaho's model. Crop residue and irrigation ditch burning are two types of burning found in Wyoming, but is limited to areas such as the Big Horn Basin and Southeastern Wyoming.

The Wyoming SMP Acreage or Pile Volume/Emissions Equivalency diagram indicates "Grass" can be burned up to 200 acres, while "Field Crops" is 130 acres. Oregon's Smoke Management Plan has 200 acres maximum for field crops and Oregon has a significantly denser population in and around their burn areas. Wyoming, like Oregon, has several grass and alfalfa seed producers, almost all of which burn their fields. We recommend Wyoming agriculture producers who do burn, be allowed up to 200 acres, an increase of 70 acres from the SMP-II plan.

Additionally, the SMP requires producers to notify populations within 10 miles downwind. First, many producers have voiced their concern to us and do not feel 10 miles is necessary. In fact their recommendation is to notify the population within one mile even at the SMP-II level. Second, the notification will take place days ahead of time, assuming they will have to call their neighbors and place a notification of their proposed burn with their local fire station, newspaper, and radio station. The verbiage "downwind" realistically must be a 10-mile circumference since the producer will not be able to

The Wyoming Department of Agriculture

is dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life.

anticipate the direction of the wind days in advance. Therefore, we recommend the SMP-II plans have only a one-mile notification requirement.

The SMP has considered many of the scientific aspects of how fire affects air quality, but is lacking in practicality with the burners who have to sift through 90 pages of procedures. When any producer burns, regardless of their location, there should be a consistent protocol for how the population is notified. The DEQ has left the notification up to the burner, which leads to many inconsistencies. We disagree with this method and believe a more concise and consistent notification method would be beneficial to all involved. The DEQ and fire stations throughout the state should work together to gather all the names and addresses of newspapers, radios, etc. This could be created in a check-off format similar to the SMP-I and SMP-II Requirement Checklist. We suggest notification should be sent out to the public by one person, such as the fire marshal, to ensure consistency. The agriculture producer could give them field locations and expected burn times. This would create consistency across the region and state.

Also, in regards to the actual document, we would recommend creating a separate document for the different type of burners. The actual SMP document should be subdivided to provide a small five-page document that only relates to say agriculture, forestry, etc. The background, instructions, forms, and all related items should be condensed and written clearly for all to read.

The SMP draft plan has had an undersized number of comments. We believe it is important to continue the draft stage, allow a selected number of actual burners to review the updated document, and put the forms into practice in 2005 before anything permanent is determined. It will be difficult to determine where to make improvements without a test-run.

Finally, we would like to see "grazing" listed on section 2.1 pg. 76, Alternatives to Burning: Agricultural Lands. Farmers will often harvest their crop and graze livestock on wheat, corn, and other crop residue.

In conclusion, we appreciate the opportunity to comment on the draft of the Smoke Management Plan. We acknowledge the need for improving air quality and minimizing the impacts on neighbors, both rural and urban. However, we also believe agriculture producers should continue to burn, and still meet the standards proposed by the SMP. We encourage continued attention to our concerns, and we look forward to hearing about proposed actions and decisions.

Sincerely,



John Etohepare
Director

JE/jw

Cc: Governor's Planning Office
Wyoming Stock Growers Association
Wyoming Wool Growers Association
Rocky Mountain Farmers Union
Wyoming Association of Conservation Districts
Wyoming Farm Bureau Federation
Wyoming State Grazing Board